

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 17, 18, 28, 35, 58, and 61-64 are pending in this case. Claims 17 is amended only to correct informalities, and Claim 28 is amended to correct informalities and with support in the originally filed disclosure at least at page 13, line 10, to page 13, line 25. Thus, no new matter is added.

In the outstanding Office Action, Claims 17, 35, 58, and 61 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takagi, et al. (U.S. Pub. No. 2003/0189557 A1, herein “Takagi”) in view of Dixon (U.S. Pub. No. 2004/0041749 A1), further in view of Park, et al. (U.S. Pub. No. 2005/0038982 A1, herein “Park”); Claims 28 and 62-64 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takagi in view of Dixon and Park¹, and further in view of Hawkins, et al. (U.S. Pat. No. 7,356,361 B1, herein “Hawkins”); and Claim 18 was rejected under 35 U.S.C. § 103(a) as unpatentable over Takagi in view of Dixon and Park, and further in view of Lee (U.S. Pat. No. 7,110,796 B2).

Applicants respectfully traverse the rejections of Claims 17, 18, 28, 35, 58, and 61-64 under 35 U.S.C. § 103(a).

With regard to Claim 17, the outstanding Office Action asserts Takagi as teaching every element except (1) “**an LED display panel . . .** which has a plurality of light-emitting diodes (LEDs) outwardly projecting light and **matrix-arranged in a plane**,” (2) “**a display control unit** controlling . . . said LED display panel on the basis of input display data,” and (3) “**a main control unit** outputting said display data displayed on said LED display panel to said display control unit,” which it asserts Dixon as teaching, and (4) that “said display-side casing is configured to be rotatable by at least approximately 180° about an axis

¹ In the outstanding Office Action, Claims 28 and 62-64 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takagi in view of Dixon and Park, and further in view of Hawkins. However, in the detailed rejections of Claims 28 and 62-64, Park was not asserted to teach any features of any of the claims.

perpendicular to the core of the first axis of the hinge,” which it asserts Park as teaching.

However, in the combination of Takagi, Dixon, and Park, the conceded deficiencies (1), (2), and (3) of Takagi are not cured by Dixon or Park.

Dixon describes, at paragraphs [0015] and [0016] an apparatus including a thermally-sensitive display 140 that displays a message after it has been “burned” to thermal-sensitive paper 150. In fact, an LED display is only mentioned in the background of Dixon. According to paragraph [0016] of Dixon, a thermal-sensitive paper 150 is selectively heated to produce an image. At page 3 of the Office Action, Dixon is relied upon as teaching the deficiencies (1), (2), and (3) with reference to Figures 3 and 4 and paragraphs [0022] and [0023].

However, Applicants note that Figure 3 of Dixon **does not represent an LED display** at all. Instead, Figure 3 of Dixon represents an exemplary embodiment of Dixon’s Figure 1, described at paragraphs [0015] and [0016]. The battery indicator at Figure 3 of Dixon is also a thermally-sensitive display **and not an LED display**. Thus, Dixon **does not** teach (1) “**an LED display panel . . .** which has a plurality of light-emitting diodes (LEDs) **outwardly projecting light and matrix-arranged in a plane**,” (2) “**a display control unit** controlling . . . **said LED display panel** on the basis of input display data,” and (3) “**a main control unit** outputting said display data displayed **on said LED display panel**.” The burned image on the thermally-sensitive display of Dixon does not “outwardly project light” at all.

Further, the proposed combination of Takagi and Dixon would not be functional, and, therefore, does not set forth a valid *prima facie* case of obviousness. MPEP § 2143.01 notes that a combination of references cannot change the principle of operation of the primary reference or render the reference inoperable for its intended purpose. Additionally, MPEP § 2141.02 recites “[i]n determining the differences between the prior art and the claims, the

question under 35 U.S.C. § 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious.”

At page 3 of the Office Action, reference 414 of Figure 4 of Dixon is asserted as teaching (2) “**a display control unit** controlling . . . **said LED display panel**,” as defined in Claim 17. However, as discussed above, because the driver circuitry 414 of Dixon drives a thermally-sensitive display rather than “**an LED display panel**,” there is no indication that it would be suitable for driving (1) “**an LED display panel**” which is certain to have alternative operating characteristics and requirements. Likewise, the logic circuitry 412 of Dixon, which enables communication with the IC 420 and which is asserted at page 3 of the Office Action as teaching (3) “**a main control unit** outputting said display data displayed **on said LED display panel**,” would not be suitable for driving (1) “**an LED display panel**,” as defined in Claim 17, because there is no indication that it is suitable for that purpose.

Park, which is asserted in the Office Action as teaching feature (4), also fails to cure the deficiencies of Takagi with respect to features (1), (2), and (3) and is not asserted to teach these features of Claim 17. Park merely describes, at Figure 1, a convertible computer and **does not teach** (1) “**an LED display panel . . . matrix-arranged in a plane**,” (2) “**a display control unit** controlling . . . **said LED display panel** on the basis of input display data,” or (3) “**a main control unit** outputting said display data displayed **on said LED display panel**,” as recited in Claim 17.

Thus, the proposed combination of Takagi, Dixon, and Park fails to teach or suggest at least the above-discussed features of Claim 17 and, additionally, fails to present a *prima facie* case of obviousness. Therefore, Applicants respectfully request that the rejection under 35 U.S.C. § 103(a) of Claim 17, and Claims 35, 58, and 61, which depend therefrom, be withdrawn.

With regard to Claim 28, the outstanding Office Action asserts Takagi as teaching

every element except **(A)** “**an LED display panel** . . . which has a plurality of light-emitting diodes (LEDs),” **(B)** “**a display control unit** controlling . . . said LED display panel,” and **(C)** “**a main control unit** outputting said display data displayed on said LED display panel to said display control unit,” which it asserts Dixon as teaching, and **(D)** “**an operation key** operable in a state that the operation-side casing and the display-side casing are in their closed position, wherein the main control unit switches display contents of the LED display panel under display state by operation of said operation key,” which it asserts Hawkins as teaching.

However, in the combination of Takagi, Dixon, and Hawkins, the conceded deficiencies **(A)**, **(B)**, **(C)**, and **(D)** of Takagi are not cured by Dixon or Hawkins.

For similar reasons as those described above with regard to Claim 17, Dixon does not cure the deficiencies **(A)**, **(B)** and **(C)** lacking in Takagi. Specifically, Dixon does not teach an **(A)** “**an LED display panel** . . . which has a plurality of light-emitting diodes (LEDs) outwardly projecting light and **matrix-arranged in a plane**” because Dixon teaches a thermally-sensitive display. Further, Dixon does not teach **(B)** “**a display control unit** controlling . . . said LED display panel” or **(C)** “**a main control unit** outputting said display data displayed on said LED display panel to said display control unit” because one skilled in the art would not consider the driver or logic circuitry of Dixon as being suitable for use with an LED display panel for the reasons discussed above.

Hawkins also fails to cure the deficiencies of Takagi and Dixon with respect to features **(A)**, **(B)**, and **(C)** and is not asserted to teach features **(A)**, **(B)**, and **(C)** of Claim 28. Further, Hawkins fails to teach or suggest even feature **(D)** for which it is asserted.

Hawkins describes, at Figures 1A and 1B and at column 8, lines 14-45, a hand held device 102 having a jog rocker switch 126 operable when a lid 106 is closed to affect a main display unit 128. Hawkins describes that, although the device may be in a power-save state

when the lid is closed, a user may actuate the jog rocker 126 to cause the device to transition from a power-save state to a power-on state and, thereby, make a main display 128 become operational by launching an application. Thus, Hawkins doe not teach or suggest feature **(D)** because, even if the jog rocker switch 126 of Hawkins describes “an operation key,” as recited by Claim 28, Hawkins does not teach or suggest that a “main control unit switches display contents of the LED display panel **under display state** by operation of said operation key,” as recited by amended Claim 28, because the jog rocker switch 126 of Hawkins switches a display from an a power-save display-inoperable state to a power-on display-operable state and does not switch display state contents of a display already under a display state.

Thus, the proposed combination of Takagi, Dixon, and Hawkins fails to teach or suggest at least the above-discussed features of Claim 28 and fails to present a *prima facie* case of obviousness. Therefore, Applicants respectfully request that the rejection under 35 U.S.C. § 103(a) of Claim 28, and Claims 62-64, which depend therefrom, be withdrawn.

Claim 18 depends from Claim 17. Thus, Claim 18 patentably defines over Takagi, Dixon, and Park for at least the same reasons as Claim 17. Further, Lee, which was additionally asserted against Claim 18, fails to cure the above-discussed deficiencies of Tagaki, Dixon, and Park with regard to Claim 17 and is not asserted for the features of Claim 17 that are discussed above as deficient in the combination of Tagaki, Dixon, and Park. Thus, Applicants respectfully request that the rejection of Claim 18, under 35 U.S.C. § 103(a), be withdrawn.

Accordingly, the outstanding rejections are traversed and the pending claims are believed to be in condition for formal allowance. An early and favorable action to that effect is, therefore, respectfully requested.

Respectfully submitted,

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